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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

THE FACEBOOK, INC. and MARK ZUCKERBERG, Plaintiffs, v. CONNECTU, INC. (formerly known as CONNECTU, LLC), PACIFIC NORTHWEST SOFTWARE, INC., WINSTON WILLIAMS, and WAYNE CHANG, Defendants.	CASE NO. 5:07-CV-01389-JW **CONNECTU'S ADMINISTRATIVE MOTION TO SEAL:** **(1) CONNECTU'S NOTICE AND MOTION FOR EXPEDITED DISCOVERY AND EVIDENTIARY HEARING;** **(2) DECLARATIONS OF EVAN A. PARKE, CAMERON WINKLEVOSS, ROBERT T. CLARKSON, AND DONNA M. HITSCHERICH AND EXHIBITS IN SUPPORT THEREOF;** **(3) [PROPOSED] ORDER ON MOTION FOR EXPEDITED DISCOVERY AND EVIDENTIARY HEARING;** **(4) CONNECTU'S MOTION TO SHORTEN TIME AND DECLARATION OF EVAN A. PARKE IN SUPPORT; AND** **(5) [PROPOSED] ORDER ON CONNECTU'S MOTION TO SHORTEN TIME.**

Dockets.Justia.com

Pursuant to Civil L.R. 7-11 and 79-5(d), ConnectU respectfully submits this administrative motion asking the Court to file under seal (1) ConnectU's Notice and Motion for Expedited Discovery and Evidentiary Hearing; (2) Declarations of Evan A. Parke, Cameron Winklevoss, Robert T. Clarkson, and Donna M. Hitscherich and Exhibits in Support Thereof; (3) [Proposed] Order on Motion for Expedited Discovery and Evidentiary Hearing; (4) ConnectU's Motion to Shorten Time and Declaration of Evan A. Parke; and (5) [Proposed] Order on ConnectU's Motion to Shorten Time.

The parties entered into, and the Superior Court of California, Superior County issued, a Stipulated Protective Order on January 23, 2006, prohibiting either party from filing in the public record any documents that have been designated as "Confidential" or "Highly Confidential" pursuant to the protective order.

ConnectU's Notice and Motion for Expedited Discovery and Evidentiary Hearing and Motion to Shorten Time and documents filed in support thereof contain information that Facebook has asserted is covered by the Protective Order and/or are alleged by Plaintiffs to implicate confidentiality provisions found in a purported agreement which is the subject of dispute between the parties.[1]

ConnectU requests that its Notice and Motion for Expedited Discovery and Evidentiary Hearing and Motion to Shorten Time and documents filed in support thereof and supporting papers remain sealed.

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[1] By filing this request to seal, ConnectU does not waive any arguments or rights as to (i) the admissibility or inadmissibility of evidence surrounding the purported agreement, (ii) the confidentiality or non-confidentiality of information relating to the purported agreement, or (iii) the enforceability or unenforceability of the purported agreement.

Dated: May 19, 2008

/s/ *Steven C. Holtzman*
Steven C. Holtzman

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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 19, 2008.

Dated: May 19, 2008

/s/ *Steven C. Holtzman*
Steven C. Holtzman